

Scott M. Riemer (SR 5005)
RIEMER & ASSOCIATES LLC
60 East 42nd Street, Suite 1750
New York, New York 10165
(212) 297-0700
sriemer@riemerlawfirm.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN A. YOUNG,

Plaintiff,

-against-

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY and CONTINENTAL
CASUALTY COMPANY,

Defendant.
-----X

09 CV 9811 (RJH) (THK)

AFFIRMATION OF
SCOTT M. RIEMER

SCOTT M. RIEMER, an attorney duly admitted to practice in the Courts of this State, does hereby affirm to be true under the penalties of perjury as follows:

1. I am counsel for plaintiff in the above-referenced action. I submit this affirmation in support of Susan Young's motion to file under seal Exhibits A through C of plaintiff's motion for summary judgment, which will be filed on February 11, 2011.
2. Attached hereto as Exhibit A is a true and correct copy of the performance appraisals produced by Hartford pursuant to the September 28, 2010 protective order for the Ability Analyst assigned to administer Young's claim. This exhibit corresponds to Exhibit A of plaintiff's motion, which will be filed on February 11, 2011.
3. Attached hereto as Exhibit B is a true and correct copy of the performance appraisals produced by Hartford pursuant to the September 28, 2010 protective order for the Clinical Case Manager assigned to administer Young's claim. This exhibit corresponds to Exhibit B of plaintiff's motion, which will be filed on February 11, 2011.

4. Attached hereto as Exhibit C is a true and correct copy of the performance appraisals produced by Hartford pursuant to the September 28, 2010 protective order for the Appeal Specialist assigned to administer Young's claim. This exhibit corresponds to Exhibit A of plaintiff's motion, which will be filed on February 11, 2011.
5. Attached hereto as Exhibit D is a true and correct copy of the Protective Order entered on September 28, 2010.

WHEREFORE, Young's motion should be granted in its entirety.

Dated: New York, New York
February 10, 2011



SCOTT M. RIEMER (SR5005)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN A. YOUNG,

Plaintiff,

-against-

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY and CONTINENTAL
CASUALTY COMPANY,

Defendant.
-----X

09 CV 9811 (RJH) (THK)

STIPULATION
FOR FILING DOCUMENTS
UNDER SEAL

WHEREAS, on September 28, 2010, the parties entered into a stipulated protective order which was so ordered by the Court;

WHEREAS, Hartford has produced documents to plaintiff pursuant to such protective order;

WHEREAS, it is the contention of Hartford that the produced documents and information contained in these documents contain confidential, business sensitive information and confidential personal employee information that should not be disclosed to the public.

WHEREAS, it is the contention of Hartford that the produced documents relate to employee information that is protected from public disclosure by federal and state privacy laws, including CONN. GEN. STAT. §31-128f.

IT IS, THEREFORE, ORDERED, that the documents attached as Exhibits A through C of the Affirmation of Scott M. Riemer, dated February 10, 2011, filed in support of plaintiff's motion for summary judgment, are to be filed under seal and remain subject to the protections of the stipulated protective order.

Dated: New York, New York
February 10, 2011



Michael H. Bernstein (MB0579)
SEDGWICK, DETERT, MORAN & ARNOLD LLP
125 Broad Street, 39th Floor
New York, New York 10004-2400



Scott M. Riemer (SR5005)
RIEMER & ASSOCIATES
60 East 42nd Street, Suite 1750
New York, NY 10165

IT IS SO ORDERED:

RICHARD J. HOLWELL
UNITED STATES DISTRICT JUDGE

DATED: _____